

# EXHIBIT 6



"I will stand for my client's rights.  
I am a trial lawyer."  
—Ron Motley (1944–2013)

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March 23, 2020

**VIA ELECTRONIC MAIL**

Via email to [sboranian@reedsmith.com](mailto:sboranian@reedsmith.com)

Steven J. Boranian  
Reed Smith LLP  
101 Second Street, Suite 1800  
San Francisco, CA 94105-3659

RE: *City of Huntington v. AmerisourceBergen Drug Corp., et al.*, Case No. 3:17-cv-01362 (S.D.W.V.);  
Custodial File Status Update

Dear Steven,

As discussed and by way of update, I write to provide production status updates for The City of Huntington's custodians. Huntington has agreed to produce 45 custodial files, to the extent their data is within the possession, custody, or control of the City. For the following custodians, production is substantially complete:

1. Jan Rader
2. Ray Canafax
3. Jim Johnson
4. Skip Holbrook
5. Kathy Moore
6. Darla Bentley
7. Margaret Mary Layne
8. Brandi Jacob Jones
9. Scott Arthur
10. Pamela Chandler
11. Kim Bailey
12. Barbara Miller
13. Breanna Shell
14. Krishawna Harless
15. Kim Roger Wolfe
16. Teresa Ferguson
17. Mark Bates
18. Tonia Kay Page
19. Rebecca Howe



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20. Ted Kleumper Jr.
21. Charles McComas
22. Carol Polan
23. Mike Shockley
24. Alex Vance
25. Jennifer Wheeler

Production for the following custodians are partially complete:

1. Rocky Johnson
2. Paul Minigh
3. Deron Runyon
4. Sherry Lewis
5. Cathy Burns
6. Bryan Chambers
7. Scott Lemley
8. Steve Williams
9. Hank Dial
10. Dan Underwood
11. Paul Hunter
12. Joe Ciccarelli
13. Craig Preece
14. Jim Insco
15. Ray Cornwell
16. Shane Bills
17. Ernie Blackburn

After good faith investigation, Huntington is unable to locate a custodial file within the City's custody, possession, or control for the following requested custodians.

1. David Felinton
2. C. Creig Moore
3. Carl Eastham

By the end of the week, the City of Huntington anticipates substantial completion of all 45 custodial files agreed to.



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With kind regards I remain,

A handwritten signature in black ink, appearing to read "Temitope Leyimu". The signature is fluid and cursive, with a long horizontal stroke at the end.

Temitope "Tope" Leyimu

cc: All Plaintiffs' Counsel, [mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com)  
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